

Noemi Tariche

From: Ariel Mitchell <ariel@arielesq.com>
Sent: Tuesday, May 13, 2025 12:11 PM
To: Andrew Jablon; shawn711@msn.com
Cc: ddavillier@davillierlawgroup.com; Noemi Tariche
Subject: Re: Ashley Parham, et al. v. Sean Combs, et al. (USDC Case No. 3:24-cv-07191-RFL) [IMAN-IMANAGE.FID1036289]

Mr. Jablon-

Please either file your motions or not.

Further, are you waiving service?

Namaste,

Ariel E. Mitchell, Esq.
The Law Office of Ariel E. Mitchell, P.A.
P.O. Box 12864
Miami, FL 33101
arielesq.com
305-903-5835

From: Andrew Jablon <ajablon@rpblaw.com>
Sent: Tuesday, May 13, 2025 3:09 PM
To: shawn711@msn.com <shawn711@msn.com>; Ariel Mitchell <ariel@arielesq.com>
Cc: ddavillier@davillierlawgroup.com <ddavillier@davillierlawgroup.com>; Noemi Tariche <NTariche@rpblaw.com>
Subject: RE: Ashley Parham, et al. v. Sean Combs, et al. (USDC Case No. 3:24-cv-07191-RFL) [IMAN-IMANAGE.FID1036289]

Counsel,

Notwithstanding our letter of May 1, 2025 detailing the frivolous nature of your client's case, we have not heard anything from either of you.

Further, in the interim, we saw that Mr. Desbordes filed a Rule 11 Motion seeking both terminating sanctions and monetary sanctions against you and your client. In addition to discussing the wildly inconsistent nature of Ms. Parham's allegations, as well as Mr. Desbordes (like Mr. Beckham) being nowhere near the site of the alleged attack on the date in question, the Motion notes his counsel was similarly ignored by the two of you in response to being provided with evidence of the frivolous nature of your clients' claims.

As a result, should we be forced to similarly proceed with a Rule 11 Motion or other available forms of relief, your pattern and practice of willfully ignoring your statutory and ethical obligations will no doubt factor into sanctions and/or damages awards.

Accordingly, I reiterate the demands in our May 1, 2025 letter, and expect that you will promptly comply.

The foregoing is not intended to be, nor should it be construed as, a full and complete recitation of all relevant facts or law, or as a waiver of any of our client's rights, remedies, or positions, all of which are expressly reserved.

Andrew



Andrew V. Jablon

T 310.788.7524 | F 310.788.6624

ajablon@rpblaw.com

Resch Polster & Berger LLP

1840 Century Park East, 17th Floor

Los Angeles, CA 90067

From: Andrew Jablon

Sent: Thursday, May 1, 2025 11:06 AM

To: shawn711@msn.com; ariel@arielesq.com

Cc: ddavillier@davillierlawgroup.com; Noemi Tariche <NTariche@rpblaw.com>

Subject: Ashley Parham, et al. v. Sean Combs, et al. (USDC Case No. 3:24-cv-07191-RFL) [IMAN-IMANAGE.FID1036289]

Importance: High

Counsel,

This office, along with the Davillier Law Group are counsel for Odell Beckham, Jr. Enclosed at the download link is our letter of today's date, along with the native file for one of the exhibits thereto.

A hard copy will follow by FedEx.

If you have any difficulty accessing the files, please let me know.

Thank you,

Andrew

ShareFile files

4.30.25 - Letter to Mitchell and Perez(1133958.1).pdf 7 MB

Exh C to Beckham [Declaration.mov](#) 24 MB

Open

Link expires on October 31, 2025



Andrew V. Jablon

Partner

T 310.788.7524 | F 310.788.6624

ajablon@rpblaw.com

[Bio](#) | [vCard](#)

Resch Polster & Berger LLP

1840 Century Park East, 17th Floor

Los Angeles, CA 90067